

REMARKS/ARGUMENTS

In the Office Action mailed September 4, 2007, claims 1-10 were rejected. Additionally, claim 1 was objected to. In response, Applicants hereby request reconsideration of the application in view of the amended claims and the below-provided remarks.

For reference, claims 1-10 are canceled, and claims 11-24 are added. In particular, claim 11 is added to present the limitations of the previous claim 1 in a better form. This amendment is supported, for example, by the language of the originally filed claim 1. Claim 12 is added to present the limitation of the previous claim 2 in a better form. This amendment is supported, for example, by the language of the originally filed claim 2. Claims 13 and 14 are added to separately claim limitations related to the contact with the receiving substrate (claim 13) and the contact with the top/protective substrate (claim 14) of the previous claim 1. These amendments are supported, for example, by the language of the originally filed claim 1. Claims 15 and 16 are added to separately claim limitations related to denying access (claim 15) and sending an alarm signal (claim 16) of the previous claim 3. These amendments are supported, for example, by the language of the originally filed claim 3. Claims 17-22 are added to present the limitations of claims 4-9, respectively, in a better form. These amendments are supported, for example, by the language of the originally filed claims 4-9. Claims 23 and 24 are added to separately recite limitations related to the continuous detection (claim 23) and the smart card (claim 24) of the previous claim 10. These amendments are supported, for example, by the language of the originally filed claim 10.

Layout of the Specification

The Office Action suggests that section headings be added to the specification, according to the guidelines set forth in the MPEP. Applicants note that the suggested section headings are not required and, hence, Applicants respectfully decline to amend the specification to include the indicated section headings.

Claim Rejections under 35 U.S.C. 112, second paragraph

Claim 1 was rejected under 35 U.S.C. 112, second paragraph. Specifically, the Office Action states that the phrase “for example” renders the claim indefinite. Applicants note that claim 1 is canceled. Therefore, the rejection of claim 1 is moot. Furthermore, the new claims do not recite the phrase “for example.”

Claim Rejections under 35 U.S.C. 103

Claims 1-10 were rejected under 35 U.S.C. 103(a) as being unpatentable over Wong et al. (U.S. Pat. No. 6,026,017, hereinafter Wong) in view of Bretschneider et al. (U.S. Pat. Pub. No. 2002/0130248, hereinafter Bretschneider). However, Applicants respectfully submit that these claims are patentable over Wong and Bretschneider for the reasons provided below.

Independent Claim 11

Claim 11 recites “a circuit arrangement in contact with at least one substrate of the receiving substrate and the top/protective substrate for detection of a voltage or a current in response to generation of charge carriers in the at least one substrate upon light incidence on the electronic memory component” (emphasis added).

In contrast, the combination of Wong and Bretschneider does not teach or suggest generation of charge carriers in at least one substrate upon light incidence. Although Wong is asserted as purportedly disclosing a receiving substrate and a top/protective substrate, Wong does not teach the P-type semiconductor material or the N-well, formed within the P-well, as being capable of generating charge carriers upon light incidence. Wong merely describes that the P-type semiconductor material is part of a P-well, which in turn is formed in an N-well, which is formed in a P-type substrate. Wong, col. 2, lines 58-61. Additionally, Wong explains that the N-well may be biased, as indicated by designation 54 of Figure 1. Wong, col. 2, lines 61-64. This allows the N-well to be set at a voltage of approximately V_{ss} or higher, such as V_{cc} . Wong, col. 4, lines 54-57. In other words, the N-well is configured to receive a voltage from an external source, but is not described as generating charge carriers in response to incident light. Hence, even if the teachings of Bretschneider were combined with the P-well and N-well teachings of

Wong, the comparator unit of Bretschneider would be unable to detect a voltage or current in the P-well or N-well in response to the generation of charge carriers upon light incidence in the P-well or N-well because Wong does not describe the P-well or the N-well as being capable of generating charge carriers upon light incidence. Rather, it would appear that the comparator unit of Bretschneider would, at best, compare the bias voltage, Vss or Vcc, applied to the N-well with another reference voltage. Therefore, the combination of cited references does not teach or suggest all of the limitations of claim 1 because Wong does not teach a substrate which generates charge carriers upon light incidence, as recited in claim. Accordingly, applicants respectfully submit that claim one is patentable over the cited references because the combination of cited references does not teach or suggest all of the limitations of the claim.

Dependent Claims 12-24

Claims 12-24 depend from and incorporate all of the limitations of the independent claim 11. Applicants respectfully assert claims 12-24 are allowable based on an allowable base claim. Additionally, each of claims 12-24 may be allowable for further reasons, as described below.

In regard to claim 16, Applicants respectfully submit that claim 16 is patentable over the combination of Wong and Bretschneider because the combination of cited references does not teach or suggest all of the limitations of the claim. Claim 16 recites “the electronic memory component is configured to emit an alarm to a controlling central processing unit (CPU) in response to detection by the circuit arrangement of the voltage in excess of a limit voltage or the current in excess of a limit current” (emphasis added). In contrast, the combination of Wong and Bretschneider does not teach generating or sending an alarm. Bretschneider merely describes blocking access to the storage unit of the chip arrangement or the whole trip arrangements in response to a failure message. The failure message is issued when the optosensitive detector unit registers irradiation of the chip arrangement. Bretschneider, paragraph 31. However, Bretschneider is silent as to the possibility of emitting an alarm to a central processing unit. Therefore, the combination of Wong and Bretschneider does not teach or suggest all of the limitations of claim because Bretschneider does not teach emitting an alarm to a central processing unit.

Accordingly, Applicants respectfully assert claim 16 is patentable over the cited references because the combination of cited references does not teach or suggest all of the limitations of the claim.

CONCLUSION

Applicants respectfully request reconsideration of the claims in view of the amendments and remarks made herein. A notice of allowance is earnestly solicited.

At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account **50-3444** pursuant to 37 C.F.R. 1.25. Additionally, please charge any fees to Deposit Account **50-3444** under 37 C.F.R. 1.16, 1.17, 1.19, 1.20 and 1.21.

Respectfully submitted,

/mark a. wilson/

Date: December 4, 2007

Mark A. Wilson
Reg. No. 43,994

Wilson & Ham
PMB: 348
2530 Berryessa Road
San Jose, CA 95132
Phone: (925) 249-1300
Fax: (925) 249-0111